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412 Mississippi Avenue
Crystal City, Missouri 63019
October 18, 1989 '89 OCT 23 P2:23

Mr. Charles Bechhoefer
Administrative Judge
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SERVED OCT 23 1989

Re: Combustion Engineering, Inc.
(Hematite Fuel Fabrication
Facility, Special Nuclear
Materials License No. SNM-33)
Docket No. 70-36-LLA

Dear Judge Bechhoefer,

In response to your request that I frame issues I believe should be presented at the hearing, I adopt as mine those issues presented by Senator Nixon in his letter filed on October 16, and wish to add three more issues.

Issue 6 Radioactive and non radioactive contaminates to air and water/citizen alert mechanism

Some radioactive dust, liquid, and gases are released to the environment during routine operation of the plant. On August 27/28, approximately (report has not been received as of this date) 275 grams of uranium was released in a accident at the plant. Not even those people living and working nearest the plant were alerted. Before new construction, it was necessary to remove five feet of contaminated dirt; common sense dictates that is contamination existed to a depth of five feet, ground water seepage has occurred in the plant buildings as well as in the approximately 40 burial sites. There is also strong evidence that excessive amounts of flourides and ammonia are routinely released.

Recommendation: Sensitive monitoring devises, controlled by the NRC, (not reported by the company) be installed so that unusual events will be noted immediately; water samples should be constantly analyzed and reported in human safety terms; some mechanism should be in place to inform the public so that people can make valid judgments as their personal safety. The NRC should assume these responsibilities and not rely on the company's reporting.

Issue 7 Transportation

Missouri Highway P, which services the plant, is narrow and winding with many blind curves and no shoulders. The potential for an accident involving trucks transporting hazardous materials to and from the plant is great.

Recommendation: Ban truck traffic during high traffic hours, particularly those hours when school buses are using the road.

Issue 8 Flooding, earthquakes, criticality accident/
Emergency response

The Combustion Engineering plant is in the flood plain of Joachim Creek, which flows into the Mississippi River about 10 miles downstream. (Crystal City's water comes from a Rainey well just down river from the confluence of the Joachim and Mississippi.) During floods, leaching is bound to occur. The New Madrid fault, second only to the San Andreas, runs through this area. There is on site sufficient enriched uranium to provide the potential for a run-away chain reaction.

Recommendation: An emergency response plan and DRILL must be provided to include a ten mile radius evacuation plan and a worse case scenario. All "all we have learned" reports indicate that knowing what to do and having practiced these activities means the difference between life and death in a nuclear accident.

I also concur in Senator Nixon's remarks as contained in his cover letter of that date and wish to state further that I am sincerely appreciative that you have decided to come to Jefferson County for the pre-hearing conference and to hear from other concerned citizens.

Certainly the Nuclear Regulatory Commission must be the guardian of the people, and while is not easy for citizens to get the attention of their guardian agencies, you are indicating a real concern for what has happened and continues to happen in Hematite, Missouri. Thank you!

Yours very truly,

Martha Dodson

State of Missouri
County of Jefferson

Martha Dodson

Subscribed and sworn to before me this 18th day of October, 1989.

Dorothy K. Barker

DOROTHY K. BARKER
NOTARY PUBLIC - STATE OF MISSOURI
JEFFERSON COUNTY
MY COMMISSION

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

COMBUSTION ENGINEERING, INC.

(Hematite Fuel Fabrication Facility
License No. SNM-33)

Docket No. (s) 70-36-MLA

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Dodson ltr to Bechhoefer 10/18 have been served upon the following persons by U.S. mail, first class, except as otherwise noted and in accordance with the requirements of 10 CFR Sec. 2.712.

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Dodson ltr to Bechhoefer 10/18

Dated at Rockville, Md. this
23 day of October 1989

Helen Boyd

Office of the Secretary of the Commission